

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA

CHRISTINE BIROS,

Plaintiff,

vs.

Case No. 17 CJ 04886

U LOCK INC.'S MOTION TO
CORRECT AND/OR STRIKE
ERRONEOUS CAPTION

U LOCK INC.

Defendant.

Filed on behalf of:

U LOCK INC., Defendant.

Counsel of record for this party:

J. Allen Roth, Esq. (PA 30347)
805 S. Alexandria
Latrobe PA 15650
(724) 537-0939
lawmatters@yahoo.com

FILED
PROTHONOTARY'S OFFICE
WESTMORELAND COUNTY

2022 MAY 19 A 11:14

GINA O'BARTO
TIME IN

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA

CHRISTINE BIROS,

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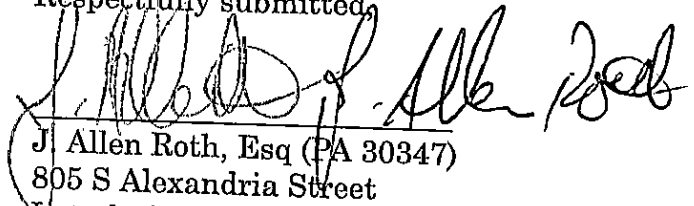
**DEFENDANT U LOCK INC.'S MOTION TO CORRECT AND/OR STRIKE
ERRONEOUS CAPTION.**

Defendant U Lock Inc., by and through its counsel, J. Allen Roth, files this Motion to Correct and/or Strike Erroneous Caption:

1. At the hearing on April 29, 2022, this Court directed U Lock and its counsel to file a motion and proposed Order to correct the caption in this case.
2. Defendant and counsel apologize for the confusion as it occurred simply because a prior template was used. Counsel notes that it did not occur as to the filings on April
3. Defendant notes that the Prothonotary's docket also shows all of the parties to the case notwithstanding the amendment of the caption. *See* Docket Sheet, attached. It is up to this Court whether to direct the Prothonotary to modify the docket sheet.

WHEREFORE, Defendant U Lock respectfully requests that this Court enter the appropriate Order as directed.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Allen Roth", is written over a horizontal line.

J. Allen Roth, Esq (PA 30347)
805 S Alexandria Street
Latrobe PA 15650
(724) 537-0939
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ATTORNEY FOR U LOCK INC.

IN THE COURT OF COMMON PLEAS OF WESTMORELAND COUNTY,
PENNSYLVANIA

CHRISTINE BIROS,

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ORDER

AND NOW, this ____ day of May, 2022, upon the consent of the defendant and the motion to correct or strike, it is hereby ORDERED, ADJUDGED, and DECREED that the Prothonotary is directed to strike off the reference in the caption on the filings of U Lock on March 17, 2022 (Motion to Strike and Exhibits in Support) as to parties other than Christine Biros and U Lock Inc.

By the Court:

Judge, Court of Common Pleas

EXHIBIT A – TEXT OF PROTHONOTARY DOCKET FOR THE CASE

Case Information

Case#	Caption	Reference File	Judgment Amt	Filed Date	Case
17CJ04886	CHRISTINE BIROS /INDIVID VS. U LOCK INC				
Jan/24/2018	LIS PENDENS NEW FILE	ACTIVE			Rita Donovan Hathaway

Parties

Party Type	Name	Address
DEFENDANT ATTY	DENNIS D DEL COTTO	4345 OLD WILLIAM PENN HWY , MURRYSVILLE , PA, 15668
DEFENDANT ATTY	J ALLEN ROTH	805 S ALEXANDRIA STREET , LATROBE , PA, 15650
DEFENDANT ATTY	JOHN A TUMOLO	437 GRANT STREET , PITTSBURGH , PA, 15219
DEFENDANT	DENISE SCHUR /EXEC	8700 CLEVELAND ROAD, CRESTON, OH, 44217, USA
DEFENDANT	ALEX SCHUR /ESTATE	
PLAINTIFF ATTY	WILLIAM E OTTOPO	BOX 701 , MURRYSVILLE , PA, 15668
PLAINTIFF	CHRISTINE BIROS /INDIVID	435 MILLERS LANE, PLUM, 15239
DEFENDANT	HENRY L MOORE /CO EXEC	310 KEYSTONE COMMONS 35 WEST PITTSBURGH STREET, GREENSBURG, PA, 15601, USA
DEFENDANT	SUSAN STANO /CO EXEC	31856 LAKE DRIVE, AVON LAKE, OHIO, 44012, USA
DEFENDANT	NICHOLAS SCHUR /ESTATE	
DEFENDANT	KATHLEEN S WALTER /EXEC	3 RIDGE COURT, SARATOGA SPRINGS, NY, 12866, USA
DEFENDANT	MICHAEL SCHUR /ESTATE	
DEFENDANT	CYNTHIA SARRIS /ADMIN	14249 HILAND PLACE, IRWIN, PA, 15642, USA
DEFENDANT	ANN SARRIS /ESTATE	
DEFENDANT	U LOCK INC	14140 ROUTE 30, NORTH HUNTINGDON, PA, 15642, USA

Events

Action Date	Action Description	Action Name	View Document
Apr/25/2022	BRIEF IN OPPOSITION TO MOTION	FOR SANCTIONS	View
Apr/21/2022	PRELIMINARY OBJECTIONS	DEFT U LOCK INCS PRELIMINARY OBJECTIONS RAISING ISSUES OF FACT TO THE PETITION FOR WRIT OF POSSESSION	View
Mar/18/2022	ORDER	PENDING SUPRME COURT OF PA WESTERN DISTRICT	View
Mar/17/2022	EXHIBITS	IN SUPPORT OF PETITION TO STRIKE ORDER OF JANUARY 20 2022 AS SET FORTH	View
Mar/17/2022	MOT/PET	STRIKE PETITION TO STRIKE ORDER OF JAN 20 2022 AS SET FORTH	View
Jan/24/2022	ORDER	ORDER JANUARY 20, 2022 NOTICE GIVEN RULE N236	View

CERTIFICATE OF SERVICE

I certify that I mailed a true copy of the foregoing to the following parties on this
12th day of May, 2022:

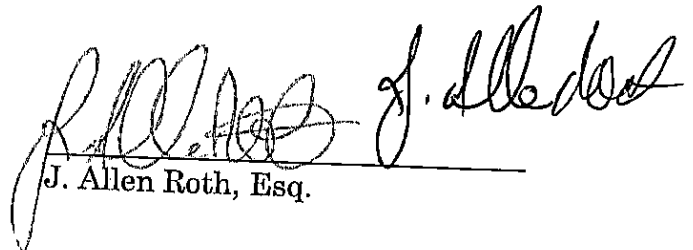
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Hon. Harry F. Smail
Court of Common Pleas
2 N Main Street, Courtroom 2
Greensburg PA 15601


J. Allen Roth, Esq.